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24 **Pro hac vice application forthcoming*

25 *Attorneys for Defendant*
26 *MGM Resorts International*

17 **UNITED STATES DISTRICT COURT**
18 **DISTRICT OF NEVADA**

19 PAUL ZARI, individually and on behalf of all
20 others similarly situated,

Case No. 2:23-cv-01777

21 Plaintiff,

22 v.
23 **STIPULATION TO EXTEND TIME**
24 **TO FILE DEFENDANT'S**
25 **RESPONSE TO COMPLAINT**
26 **(THIRD REQUEST)**

27 MGM RESORTS INTERNATIONAL,
28 Defendant.

29 Pursuant to LR IA 6-1, Plaintiff Paul Zari and Defendant MGM Resorts International
30 ("MGM") (collectively, the "Parties") respectfully stipulate MGM's time to respond to the
31 Complaint be extended from the current deadline of January 11, 2024 to and including March

32 STIPULATION TO EXTEND TIME TO FILE DEFENDANT'S RESPONSE TO COMPLAINT
33 CASE NO. 2:23-CV-1777

1 11, 2024. This is the third stipulation for an extension of time to file MGM's responsive
 2 pleading. The court previously granted an extension on December 12, 2023. ECF No. 18.

3 Good cause exists to enlarge the time for MGM to respond to the Complaint. There
 4 are currently twelve other related actions filed against MGM pending in the District of
 5 Nevada (the "Related Actions"). *See Kirwan v. MGM Resorts Int'l*, No. 2:23-cv-01481;
 6 *Owens v. MGM Resorts Int'l*, No. 2:23-cv-01480; *Lackey v. MGM Resorts Int'l*, No. 2:23-
 7 cv-01549; *Zussman v. Vici Properties Inc., et al.*, No. 2:23-cv-01537; *Terezo v. MGM*
 8 *Resorts Int'l*, No. 2:23-cv-01577; *Pircio v. MGM Resorts Int'l*, No. 2:23-cv-01550; *Bezak v.*
 9 *MGM Resorts Int'l*, No. 2:23-cv-01719; *Albrigo v. MGM Resorts Int'l*, No. 2:23-cv-1981;
 10 *Rundell v. MGM Resorts Int'l*, No. 2:23-cv-01698; *Manson v. MGM Resorts Int'l*, No. 2:23-
 11 cv-01826; *Sloan v. Vici Properties Inc., et al.*, No. 2:23-cv-02042; *Righetti v. MGM Resorts*
 12 *Int'l*.

13 On December 6 and December 20, 2023, plaintiffs' counsel in six consolidated
 14 putative class actions brought against MGM by individuals who allege their PII was
 15 compromised as a result of a cybersecurity incident involving MGM in 2019 (the "2019
 16 Actions") filed Notices of Related Cases Pursuant to District of Nevada Local Rule 42.1,
 17 notifying the Court that the Related Actions are related to the 2019 Actions. *In re: MGM*
 18 *Resorts Int'l Data Breach Litig.*, No. 2:20-CV-00376-GMN-NJK, ECF 186, 188. Plaintiffs
 19 in this action have opposed this effort because the 2019 Actions involved a different threat
 20 actor and different data.

21 The parties in the Related Actions are discussing this development in addition to the
 22 consolidation of the Related Actions. As such, additional time is required to permit time to
 23 meet and confer with the various parties to the Related Actions.

24 The Parties' request is made in good faith to enable the parties to finalize the joint
 25 motion for consolidation and conserve judicial and party resources. Moreover, this case is
 26 in its infancy, and this request will not prejudice any party.

27 ...
 28 ...

1 **WHEREAS** the Parties respectfully request that MGM shall have until March 11,
2 2024, to answer, move, or otherwise respond to the Complaint.

3 Dated: January 8, 2024

Respectfully submitted,

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/s/ Nathan R. Ring

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16 *MGM Resorts International*

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18 **IT IS SO ORDERED**

19 **DATED:** 5:17 pm, January 09, 2024

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21 **BRENDA WEKSLER**
22 **UNITED STATES MAGISTRATE JUDGE**

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